

**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION**

**APPLICATION OF ADVANCE ENERGY PARTNERS
HAT MESA, LLC FOR A NON-STANDARD OIL SPACING
AND PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE No. 16092

**APPLICATION OF ADVANCE ENERGY PARTNERS
HAT MESA, LLC FOR A NON-STANDARD OIL SPACING
AND PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE No. 16093

**APPLICATION OF ADVANCE ENERGY PARTNERS
HAT MESA, LLC FOR A NON-STANDARD OIL SPACING
AND PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE No. 16094

PRE-HEARING STATEMENT

Advance Energy Partners Hat Mesa, LLC ("Advance Energy"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT:

**ADVANCE ENERGY PARTNERS
HAT MESA**

**ADVANCE ENERGY PARTNERS HAT
MESA, LLC's ATTORNEY**

J. Scott Hall, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873
shall@montand.com

OTHER PARTIES

COG OPERATING LLC

OTHER PARTIES' ATTORNEY

Ocean Munds-Dry
William F. Carr
1048 Paseo de Peralta
Santa Fe, NM 87501
omundsdry@concho.com

STATEMENT OF THE CASE

In Case No. 16092, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 320-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the W/2 W/2 of Section 15 and the W/2 W/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests underlying the non-standard unit.

In Case No. 16093, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 320-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the E/2 W/2 of Section 15 and the E/2 W/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests underlying the non-standard unit.

In Case No. 16094, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 320-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the W/2 E/2 of Section 15 and the W/2 E/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests underlying the non-standard unit.

PROPOSED EVIDENCE

APPLICANT'S WITNESSES

EST. TIME

EXHIBITS

ADVANCE ENERGY PARTNERS HAT MESA, LLC

Paul Burdick, Land

20 min.

12

Ed Caamano, Geology

10 min.

8

OTHER PARTIES' WITNESSES

EST. TIME

EXHIBITS

COG OPERATING LLC

Unknown

PROCEDURAL MATTERS

Applicant requests that Case Nos. 16092, 16093 and 16094 be consolidated for hearing.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ J. Scott Hall

J. Scott Hall

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

*Attorneys for Advance Energy Partners Hat Mesa,
LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on May 24, 2018:

Ocean Munds-Dry
William F. Carr
1048 Paseo de Peralta
Santa Fe, NM 87501
omundsdry@concho.com
wcarr@concho.com

Attorneys for COG Operating LLC

/s/ J. Scott Hall
J. Scott Hall